

DCW

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 11-343

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

SANDRA RICHARD,

Defendant.

- - - - -X
EASTERN DISTRICT OF NEW YORK, SS:

KYLER HARDIN, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about April 1, 2011, within the Eastern District of New York and elsewhere, the defendant SANDRA RICHARD did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about April 1, 2011, the defendant SANDRA RICHARD, arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard Carribean Airlines Flight No. 520 from Trinidad and Tobago.

2. During a border enforcement examination, Customs and Border Protection ("CBP") officers noticed, among other things, that RICHARD appeared to be unusually nervous.

3. CBP officers conducted a search of RICHARD's luggage, but the results were negative. CBP officers then conducted a pat down search of RICHARD. During the course of the pat down search, a hard object was felt around RICHARD's groin area. Thereafter, a partial strip search of RICHARD revealed that she had a package wrapped in plastic concealed in her undergarments. A probe of the package revealed that it contained a white powdery substance. The substance field tested positive for cocaine. Thereafter, RICHARD was placed under arrest.

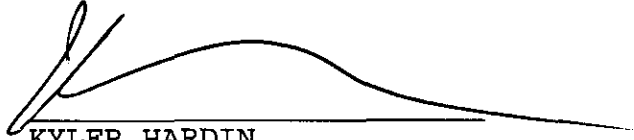
4. Following defendant SANDRA RICHARD's arrest, she was given Miranda warnings which she appeared to understand and waived. The defendant then told authorities that she knew that

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

she was transporting cocaine, and that she was going to be paid for bringing it into the United States.

5. The total approximate gross weight of the cocaine found in RICHARD's undergarments is 1,021.3 grams.

WHEREFORE, your deponent respectfully requests that the defendant RICHARD be dealt with according to law.



KYLER HARDIN
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
2nd day of April, 2011



THE
UNIT
EAST

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K
JUDGE
YORK